

**ORIGINAL**

**UNITED STATES DISTRICT COURT**  
for the

Northern District of Indiana

United States of America )  
v. )  
 ) Case No. 1:24-MJ- 134  
 )  
 )  
THOMAS A. TEDERS, JR. )  
\_\_\_\_\_  
Defendant(s) )

**SEALED****-FILED-**

DEC 03 2024

At \_\_\_\_\_ M  
Chanda J. Berta, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 26, 2024 in the county of Allen in the  
Northern District of Indiana, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 842(a)(1)	Knowingly and intentionally distribute 50 grams or more of methamphetamine.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.



Complainant's signature

Gavin Dambra, TFO FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/03/2024

**S/Paul R. Cherry**

Judge's signature

City and state: Fort Wayne, Indiana

Paul R. Cherry, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

Comes now, Task Force Officer Gavin Dambra of the Federal Bureau of Investigation (FBI), first being duly sworn, now deposes and says:

I am a Task Force Officer (TFO) with the FBI's Indianapolis Division, Fort Wayne Resident Agency, Fort Wayne Safe Streets Gang Task Force (FWSSGTF). I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I have been employed by the Fort Wayne Police Department (FWPD) as a police officer since July of 2014. I worked in the capacity as a patrol officer from July of 2014 until December of 2018. I worked as a patrol officer with FWPD until I transferred to the Vice and Narcotics Division, as a Gang and Violent Crime detective, in December of 2018. I then served as a uniform detective within this division for approximately three and a half years. As a Gang and Violent Crime detective, some of my duties included conducting firearms investigations, obtaining search warrants, following up on drug-related tips, conducting traffic stops, conducting knock-and-talk investigations, conducting surveillance, responding to violent crimes including shootings and robberies, and assisting with patrol car cases. In March of 2022, I became a full-time TFO with the FBI's FWSSGTF, and my duties have included working gang cases, drug cases, gun cases, and bank robberies and assisting with white collar crimes and with violent crimes against children. During my time as a TFO with the FWSSGTF, I have been involved with investigating several long-term and complex drug trafficking organizations, including multiple investigations involving the transportation of large drug amounts from Arizona to Indiana through various means including commercial airlines and both public and private mail and transportation services. Furthermore, I have attended training

courses and conferences specializing in the investigation of narcotics trafficking and investigation of criminal gangs.

I have been personally involved in the investigation discussed in this affidavit. In addition to my personal knowledge, the statements contained in this affidavit are based in part on the following: information provided verbally and in written reports by other law enforcement personnel, information gathered during the utilization of various investigative techniques, records maintained by the National Crime Information Center (NCIC) and the Indiana Bureau of Motor Vehicles (BMV), and my training and experience. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, witnesses, business records, and databases.

This affidavit is provided to establish probable cause to believe that between on or about September 26, 2024, Thomas A. Teders, Jr. (herein after "Teders"), M/Wht, DOB March 26, 1987, knowing and intentionally distributed 50 grams or more of methamphetamine, a Schedule II controlled substance in violation of Title 21 United States Code Section 841(a)(1). Because this affidavit is being submitted for the purpose of providing probable cause for the issuance of an arrest warrant for Rogers, Your Affiant has not included each and every fact known or provided by members of the FBI, Fort Wayne Police Department or other law enforcement officers concerning the individual events described herein.

#### FACTS SUPPORTING PROBABLE CAUSE

In the summer of 2024, a confidential human source (CHS) told investigators that an individual, who was later identified as Thomas Teders, was selling drugs, including M-30 fentanyl pills. During this investigation, investigators learned that Teders was also selling Methamphetamine. The CHS is cooperating with law enforcement for potential monetary

compensation. The CHS has received approximately \$5,256 as of November 20, 2024, for their assistance to law enforcement. There are currently no pending criminal charges against the CHS nor is the CHS the target of any current criminal investigation. The CHS has a no criminal history. The CHS is credible and reliable in your Affiant's opinion because the CHS has been corroborated significantly though information gathered through unrelated law enforcement investigations in which significant quantities of narcotics were seized and through controlled narcotics purchase(s) in this investigation.

On Thursday, September 26, 2024, at approximately 11:50 hours, investigators met with the CHS at a pre-determined meet location. The CHS advised that the CHS would meet Thomas Teders at 1601 Third Street, Fort Wayne, Indiana, in the Northern District of Indiana, and purchase two pounds of Methamphetamine for \$3,240. It should be noted that prior to meeting with investigators, the CHS communicated with Teders to arrange the transaction at the direction of investigators. At approximately 12:05 hours, a pre-buy search of the CHS was performed, no items of contraband were located. The CHS was equipped with audio/video recording device and was given \$3,240 of pre-recorded buy money. At approximately 12:09 hours, an undercover investigator and the CHS traveled to 1601 Third Street, Fort Wayne, Indiana

At approximately 12:15 hours, an undercover investigator and the CHS arrived in front of 1605 Third Street. At approximately 12:16 hours, the CHS exited the investigators undercover vehicle and entered onto the porch of 1601 Third Street, made contact with Teders, and entered the front door into the residence. At approximately 12:19 hours, Teders and the CHS exited the residence with the CHS returning to the undercover investigator's vehicle.

At approximately 12:23 hours, investigators met with the CHS and the undercover investigator at the pre-determined meet location. Investigators took custody of the two pounds of

suspected Methamphetamine, along with audio/video recording device. At approximately 12:23 hours, a post-buy search of the CHS was performed, no items of contraband were located.

During a debriefing, the CHS explained that the CHS met with TEDERS in the kitchen area of the residence and exchanged the pre-recorded buy money for the suspected Methamphetamine from Teders. Your Affiant notes that the CHS's description of the transaction was corroborated by the surveillance observations and the information on the video and audio recording device. Your Affiant reviewed the video recording of the transaction and positively identified Teders in the video.

Investigators returned to the FWPD Narcotics office with all items of evidence. All items were placed into continuity along with a copy of the audio/video recording that was placed into digital evidence storage. Investigators field tested the crystal-like substance and received a positive response for Methamphetamine. Bag weight of the suspected Methamphetamine was approximately 916.2 grams.

Based upon the foregoing, your Affiant has probable cause to believe that, on or about September 26, 2024, in the Northern District of Indiana, Thomas A. Teders, Jr. did knowingly and intentionally distribute a controlled substance, namely, 50 grams or more of methamphetamine, a Schedule II Controlled Substance, all in violation of 21 U.S.C. § 841.

The foregoing facts are true to the best of your Affiant's knowledge and belief, and further  
your Affiant sayeth naught.



Gavin Dambra  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn to before me, this 3rd day of December, 2024.



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Paul R. Cherry  
United States Magistrate Judge  
Northern District of Indiana